

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RIMU CAPITAL LTD.,

*Plaintiff,*

- and -

26 CAPITAL HOLDINGS LLC,

*Nominal Plaintiff,*

- against -

JASON ADER, *et al.*,

*Defendants.*

No: 1:23-cv-05065 (LJL)

**STIPULATION AND  
ORDER**

**WHEREAS**, on October 12, 2023, the Court entered a Protective Order in this action (“Protective Order,” ECF No. 51); and

**WHEREAS**, Plaintiff’s First Amended Complaint and Second Amended Complaint, filed after the Protective Order, added parties as Defendants;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned that: (i) all current parties to this action agree to abide by the terms of the Protective Order; and (ii) all references to “Party” or “Parties” in the Protective Order are deemed to include all current parties to this action.

Dated: October 21, 2024

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*Attorneys for Nominal Plaintiff  
26 Capital Holdings LLC*

**SO ORDERED:**

Dated: October 21, 2024  
New York, New York

**PROSKAUER ROSE LLP**

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*Attorneys for Defendant Pamela Ader*

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LEWIS J. LIMAN  
United States District Judge